DIRECT TESTIMONY OF

JERRY L. HAMPTON

ON BEHALF OF AMERITECH ILLINOIS

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Jerry L. Hampton. My business address is 350 N. Orleans, Chicago, Illinois 60654.

Q. What is your current employment?

A. I am employed by Ameritech as Associate Director of Wholesale Marketing for SBC's Industry Markets organization.

Q. Please describe your educational background.

A. I graduated with honors from Sangamon State University (now known as the University of Illinois at Springfield) with a Bachelor of Arts in Management in May 1983. From 1977 through 1979, I attended Southern Illinois University pursuing a Business Administration/Management Information Systems major. Prior to that, in May 1977, I received an Associates degree (with honors) in accounting from Rend Lake Junior College in Ina, Illinois.

Q. Please describe your work background.

A. From August 1997 through July 2000, I was a Product Manager for Unbundled Network Elements at Ameritech Information Industry Services ("AIIS"), now known as Industry Markets. During that time, I was responsible for the entire unbundled local transport line of products, including dedicated unbundled transport, shared unbundled transport, and dark fiber products. As product manager, I was responsible for the development and implementation (in accordance with the Federal Telecommunications Act of 1996 – "TA96") of the products, product strategy, and pricing of these products. I also participated in discussions with commission staffs and technical conferences on subjects related to the various products I supported.

From January 1996 through August 1997, I was a Senior Analyst – Customer Operations at AIIS. In that position, I was responsible for unbundled services and I served as a liaison for AIIS to the Ameritech representatives on the national Ordering and Billing Forum ("OBF").

From July 1993 through January 1996, I was Senior Analyst – Ameritech Long Distance Industry Services ("ALDIS"). In that position, I was responsible for the documentation of technical requirements and the management of assigned projects through analysis, design, development, testing and installation. Projects I managed included Customers First products and Carrier Access Billing System ("CABS") changes for the Ameritech Debit Card and Telecommunications Relay Services. Also, I was lead member of the team that restructured the ALDIS Customer Services & Support organization to speed the implementation of projects and services.

From July 1989 through July 1993, I was an Associate Manager at Ameritech Services. In that position, I was the regional manager for CABS OnLine, responsible for

the facilitation and implementation of enhancements to the OnLine system. I also chaired the Regional CABS OnLine Committee which determined, developed, and implemented all changes to the On-Line system.

From June 1975 through July 1989, I held various other craft and management positions at Illinois Bell Telephone Company including Long Distance Toll Operator, Service Representative – Business Service Center ("BSC"), Service Representative – Interexchange Carrier Service Center ("ICSC"), ICSC Staff for Switched Access New Products & Services, and CABS OnLine Project Manager.

Q. What are your general duties in your current position?

A. I am responsible for participating in the development and presentation of SBC's Wholesale Marketing products, as well as providing support for the applicable product policies.

Q. Have you previously testified before the Illinois Commerce Commission (the "Commission")?

A. Yes. I presented testimony before the Illinois Commerce Commission in the TELRIC Compliance Docket No. 98-0396 on Unbundled Local Switching with Interim Shared Transport ("ULS-IST"). I have also participated in the workshops held in Docket No. 00-0538/0539 supporting the UNE Remand Filing, particularly the discussions on Sub-Loops and Dark Fiber. In addition, I have participated in workshops addressing Unbundled Local Switching with Shared Transport ("ULS-ST").

Q. Have you previously testified before any other regulatory agencies?

A. Yes. I presented testimony in Michigan Case Nos. U-12072 (MCI Unbundled Local Transport Complaint), U-12540 (Ameritech Michigan's UNE Remand and Line Sharing Cost Application), and U-12622 (ULS-ST filing resulting from the 271 Collaboratives). I presented testimony before the Public Utilities Commission Of Ohio in Case No. 00-1368-TP-ATA (Ameritech Ohio's ULS-ST and Unbundled Network Element Platform – "UNE-P" tariffs). I also presented testimony before the Public Service Commission of Wisconsin in Case No. 6720-TI-160 (Operations Support System – "OSS" Investigation) supporting the ULS-ST and Dark Fiber tariffs.

II. PURPOSE AND ORGANIZATION OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to describe the new shared transport product, Unbundled Local Switching With Shared Transport (ULS-ST), that Ameritech Illinois implemented October 8, 2000 as required by the Illinois[1] and FCC SBC/Ameritech Merger Conditions.[2] I will also demonstrate how Ameritech Illinois' ULS-ST tariff establishes terms and conditions that are reasonable and in full compliance with applicable FCC and Illinois Commission requirements. Among other things, I will respond to the question in paragraph 5(b) of the order initiating this docket, which refers to shared transport and intraLATA toll traffic.

[1] Order, Ill. C.C. Dkt. No. 98-0555, at 252-53, Condition 28(B) (Sept. 23, 1999) ("Illinois Merger Order").
[2] Memorandum Opinion and Order, CC Docket 98-141 (FCC 99-279), App. C at ¶ 56 (rel. Oct. 5, 1999) ("FCC Merger Order").

Q. How is your testimony organized?

A. I will provide a description of the new ULS-ST product, the basic ordering process for ULS-ST, and the pricing for ULS-ST. I will also discuss the impact to the Unbundled Network Element Platform (UNE-P) product offering resulting from the transition from Unbundled Local Switching with Interim Shared Transport ("ULS-IST") to ULS-ST. Lastly, I will address the custom routing of OS/DA traffic in conjunction with ULS-ST.

Q. Is the ULS-ST product that is offered by Ameritech Illinois available in Interconnection Agreements as well as in the Ameritech Illinois Tariff?

A. Yes. A ULS-ST amendment is available. This amendment can be used by Competitive Local Exchange Carriers ("CLEC") to add ULS-ST to their current agreements. Also, the 13-State Generic Interconnection Agreement is being updated to contain ULS-ST.

Q. Do you have any Schedules to your testimony?

A. Yes, I have the following Schedules:

Schedule JLH-1 - Unbundled Local Switching with Shared Transport (ULS-ST) (Tariff ILL. C.C. No. 20, Part 19, Section 21)

Schedule JLH-2 - ULS-ST Call Flows

III. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST)

Q. What is ULS-ST?

A. ULS-ST is the acronym Ameritech Illinois uses for its shared transport and local switching Unbundled Network Element (UNE) product offering. A copy of the ULS-ST tariff is attached as Schedule JLH-1.

Because the Shared Transport UNE cannot be provided separate from Local Switching, ULS-ST always includes both Unbundled Local Switching (ULS) capability and Shared Transport capability.

The ULS component provides unbundled access to the local switching capability through a line-side and/or trunk-side port, which provides access to all features, functions, and capabilities of the end office switch. This ULS capability is provided separate from the local loop or other services on a per line basis.

The Shared Transport component provides the interoffice trunk network portion of the ULS-ST product, including end office and tandem trunk ports, tandem switching, interoffice facilities between Ameritech's switches, and central office routing tables. Shared Transport delivers telecommunications carrier's switched voice traffic for local calls on Ameritech's interoffice trunk network. Telecommunications carriers subscribing to ULS-ST may also use it to carry originating access traffic from, and terminating access traffic to, end users to whom the requesting carrier is also providing local exchange service.

In short, Shared Transport refers to all local transmission facilities connecting Ameritech's switches that can be shared by more than one LEC, including Ameritech. Those transmission facilities include those between Ameritech's end office switches, between Ameritech's end office switch and Ameritech's tandem switch, and between Ameritech's tandem switches, as described in the FCC's Third Reconsideration Order in CC Docket 96-98, ¶ 54 (rel Aug. 19, 1997), and FCC Rule 319(d)(1)(iii) (47C.F.R. § 51.319(d)(1)(iii)).

Finally, Ameritech Illinois will use the existing Ameritech routing tables contained in Ameritech switches to provision ULS-ST.

Q. Is ULS-ST Ameritech's long term version of Shared Transport required by the ICC and FCC Merger conditions?

A. Yes, it is. Ameritech Illinois is providing the ULS-ST product in compliance with commitments adopted in the Illinois Merger Order and FCC Merger Order. Those decisions required Ameritech to provide an interim Shared Transport product that was to be replaced within one year of the merger by another that provides the function of shared transport under terms and conditions, other than rate structure and price, that are substantially similar to (or more favorable than) the most favorable terms SBC offered to telecommunications carriers in Texas as of the merger closing date.

Q. Does ULS-ST replace the interim Shared Transport product with a version of shared transport that is substantially similar to that offered (other than rate structure and price) in Texas as of the merger closing date?

A. Yes, it does. Ameritech Illinois' ULS-ST product replaced the previous interim shared transport product, ULS-IST, and fully meets the ICC's and FCC's merger conditions.

Q. Is the ULS capability of ULS-ST and its predecessor ULS-IST the same?

A. Yes, it is. In fact, from both an end user and CLEC perspective, the ULS capability is identical for our ULS, ULS-IST, and ULS-ST product offerings.

Q. How are ULS-ST and ULS-IST different?

A. There is no difference in the functionality of the two services. A call originating from a ULS port, associated with either ULS-ST or ULS-IST, will complete to any other point in the Public Switched Network using Ameritech's network to the point of handoff for the appropriate carrier in the same way as a call from an Ameritech end user. The real difference between ULS-ST and ULS-IST is in how usage is recorded and billed, especially to the CLEC .

Q. What changes did Ameritech Illinois make in usage recording for ULS-ST?

A. In order to provide ULS-ST, Ameritech Illinois implemented an Advanced Intelligent Network ("AIN") solution within all the Ameritech switches in Illinois that identifies usage as originating from or terminating to a ULS port.

This AIN solution allows Ameritech Illinois' central office switches to identify, record, and track traffic terminating to ULS ports. This AIN solution also provides the ability to identify that an access call (originating and terminating) belongs to the CLEC instead of Ameritech when made from/to ULS ports.

Q. What changes did Ameritech Illinois make in usage billing for ULS-ST?

A. The following changes were made in billing for ULS-ST:

- The ULS Switch Usage Charge from ULS-IST has been renamed the ULS Usage Rate Associated With ULS-ST Rate and will apply on a per minute-of-use ("MOU") basis to terminating usage (as well as continuing to apply to originating usage).[3]

[3] The ULS Usage Rate Associated With ULS-ST Rate for both originating and terminating traffic has been set to zero on an interim basis pending the outcome of this docket.

- The CLEC will no longer receive a ULS-IST Access Charge Settlement because Ameritech Illinois will provide the CLEC with the access records so that the CLEC can bill the Interexchange Carrier (IXC) directly.
- Ameritech will no longer bill the IXC either originating or terminating access usage charges for traffic from/to ULS ports.
- The single factored IST Capability Usage Rate that previously applied per originating MOU is eliminated and replaced by new rate elements that more closely match the shared transport rate structure being provided in Texas. These are:
  - ULS-ST Blended Transport Usage Rate
  - ULS-ST SS7 Signaling Transport Rate
  - ULS-ST Reciprocal Compensation Rate
  - ULS-ST Common Transport Rate
  - ULS-ST Tandem Switching Rate

  This rate structure for ULS-ST follows a "cost-causer" principle, in that the telecommunications carrier pays for the portions of the network used to carry that CLEC's end user traffic.

Q. Please describe each of the new ULS-ST rate elements and when they apply.

A. ULS-ST Blended Transport Usage Rate – Applies to local ULS-Originating interswitch calls. The ULS-ST Blended Transport Usage rate is based on MOUs per port, per month and applies in addition to the ULS Usage Rate Associated With ULS-ST Rate. The rate is a combination of Shared Transport and Shared Transport-Transit. The rate is based upon use of the following portions of the network:

- Direct routed local traffic to a Company end office
- Tandem routed local traffic to a Company end office
- Direct routed local traffic to a non-Company end office
- Tandem routed local traffic to a non-Company end office

ULS-ST SS7 Signaling Transport Rate – This rate is applied on originating ULS-ST interswitch calls on a per call basis, per port, per month.

ULS-ST Reciprocal Compensation Rate – This rate is applied on originating ULS-ST interswitch calls on a per MOU basis, per port, per month. The rate chargeable by Ameritech Illinois for terminating the local traffic originated from a ULS-ST port, as well as reciprocal compensation chargeable by the telecommunications carrier for local traffic terminated to its ULS-ST port, will be set at the same rate as ULS Usage Rate Associated With ULS-ST, per the tariff. The telecommunications carrier that purchases ULS-ST will be solely responsible for establishing compensation arrangements with all telecommunications carriers to which traffic is delivered, or from which traffic is received, using ULS-ST, including all traffic carried by Shared Transport-Transit.

ULS-ST Common Transport Rate – Applies when an Ameritech tandem switch and transmission facilities are used to deliver InterLATA (PIC) or Interexchange IntraLATA toll (LPIC) traffic to/from a ULS-ST port. The rate is based on MOUs per port, per month. The rate does not apply in a call scenario where the PIC'd (PIC or LPIC) Interexchange Carrier is directly connected at the Ameritech end office for delivery of PIC'd traffic.

This element is associated with the following one and is used to recover for use of the transport to the tandem.

ULS-ST Tandem Switching Rate – Applies when an Ameritech tandem switch and transmission facilities are used to deliver InterLATA (PIC) or Interexchange IntraLATA toll (LPIC) traffic to/from a ULS-ST port. The rate is based on MOUs per port, per month. The rate does not apply in a call scenario where the PIC'd (PIC or LPIC) Interexchange Carrier (IXC) is directly connected at the Ameritech end office for delivery PIC'd traffic.

This element is associated with the preceding one and is used to recover for use of switching at the tandem.

Q. Can you provide examples of how these rate elements apply?

A. Yes, I can. Schedule JLH-2 provides call flow diagrams for various call scenarios using ULS-ST. The call flow diagrams reflect calls both to and from a ULS port and provide an explanation of what rate elements are billed for each call scenario.

Q. With respect to the ULS-ST Reciprocal Compensation Rate, you state that this rate is also the reciprocal compensation rate used to compensate CLECs for local traffic that Ameritech Illinois terminates to a CLEC's ULS-ST port. Why is this so?

A. Interconnection requires each party to compensate the other for terminating local traffic on the other's network. One method of doing that is via reciprocal compensation.

Ameritech Illinois studied the switching cost to terminate a local call from a ULS-ST port to an Ameritech port on our network. This is the ULS-ST Reciprocal Compensation Rate. For intraswitch traffic, where the terminating port is within the same end office switch, there is no additional cost; therefore no ULS-ST Reciprocal

Compensation Rate applies. When the terminating port is on a different end office switch the ULS-ST Reciprocal Compensation Rate applies.

Because the cost to terminate a local call to either an Ameritech port or a CLEC ULS-ST port is the same, the reciprocal compensation rate charged for terminating such a call should be the same. Therefore, the rate that a CLEC should charge Ameritech for terminating a local call to the ULS-ST port should equal only the cost of terminating the call. This is the same amount that Ameritech Illinois is billing the CLEC for terminating the local call to the ULS-ST port (terminating ULS Usage Rate Associated With ULS-ST Rate) and is therefore the "cost" to the CLEC for that call.

Facility based reciprocal compensation rates normally recover for both the end office switching as well as the terminating trunk port. If the facility based interconnection rate were charged, as provided for in the CLECs tariffs, the CLEC would be recovering for a trunk port that they are not providing. For traffic terminating to a ULS-ST port, Ameritech is responsible for delivering the traffic to the office. The only cost to the CLEC is the ULS terminating usage charge for the switching in that office.

Q. Are the CLECs limited to charging this same amount for local calls involving the ULS-ST port and other Local Exchange Carriers (LECs)?

A. No. Ameritech believes that the cost to terminate the call is the appropriate rate; to do otherwise would mean that the originating party is paying twice for the trunk port. This would be the rate Ameritech Illinois charges the CLEC to terminate the local call on the ULS-ST port. However, compensation arrangements between LECs should be agreed to between themselves.

Q. Since CLECs have tariffs for reciprocal compensation rates, will they be required to file new tariffs?

A. No they will not. Like Ameritech Illinois, CLEC tariffs for reciprocal compensation are specific to situations where each party has its own switch and have rates that are based on those costs.

Because ULS-ST is a product that is purchased from Ameritech Illinois, the terms, conditions, and rates surrounding that ULS-ST port and the CLEC's relationship with Ameritech Illinois are governed by the ULS-ST tariff. This includes the compensation for local traffic originating from the ULS-ST port, which terminates to an Ameritech port, or local traffic originating from an Ameritech port, which terminates to the ULS-ST port.

This necessarily is different than the relationship for an interconnection situation where each party is purchasing a connection to the other's network either from their tariff or via an interconnection agreement.

Q. Can ULS-ST be used to transit traffic across Ameritech Illinois' network between other carriers?

A. Yes, it can. One of the components of ULS-ST is the Shared Transport-Transit function. This voluntary portion of our shared transport offering allows telecommunications carriers to transport calls on shared facilities to non-Ameritech central office switches providing local, wireless, and interexchange services.

Q. Why do you qualify the Shared Transport-Transit function as voluntary?

A. The FCC's Third Reconsideration Order (¶ 28) and FCC Rule 319(d)(1)(iii) provide that dedicated transport (and not shared transport) must be used between Ameritech's central office switches or Ameritech's serving wire centers ("SWC") and the requesting telecommunications carrier switches. In addition, the FCC Third Reconsideration Order (¶ 29) provides that it must be dedicated transport from an Ameritech central office switch to an Ameritech SWC. However, Ameritech Illinois will not require telecommunications carriers that subscribe to ULS-ST to use unbundled dedicated transport or customized routing to originate and complete traffic through Ameritech's network to non-Ameritech switches. Instead, Ameritech Illinois provides a modified version of transiting that does not require a dedicated end office integration ("EOI") transit trunk. This transit function (called "Shared Transport-Transit") permits telecommunications carriers subscribing to ULS-ST to use shared facilities and not unbundled dedicated transport between Ameritech's central office switches and non-Ameritech central office switches providing local, wireless, or interexchange services.

Q. Who is responsible for the compensation for traffic that is delivered using Shared Transport-Transit?

A. The telecommunications carrier that purchases ULS-ST is solely responsible for establishing compensation arrangements with all telecommunications carriers to which traffic is delivered, or from which traffic is received, using the Shared Transport-Transit capability of ULS-ST.

Q. Can you provide examples of how the rate elements apply when Shared Transport-Transit is used?

A. Yes. Again, Schedule JLH-2 provides call flow diagrams for various call scenarios using ULS-ST. The diagrams specific to the use of Shared Transport-Transit for local calls are scenarios 13 and 14.

IV. ULS-ST AND INTRALATA TOLL CALLS

Q. The Commission has asked for evidence on "Whether Ameritech's restriction of the shared transport offering to local exchange traffic is appropriate and should be maintained, specifically, whether shared transport should be available for use by CLECs in transporting their intraLATA toll traffic." Can ULS-ST be used to transport Interexchange IntraLATA toll calls?

A. Yes, it can. ULS-ST can be used to carry an Interexchange IntraLATA toll call from a ULS port to the Feature Group D ("FG-D") trunk port of the Interexchange Carrier ("IXC") that is indicated by the presubscribed intraLATA toll carrier ("LPIC") on the ULS port.

Q. Can ULS-ST be used by an IXC to transport an Interexchange IntraLATA toll call across the Ameritech Illinois network?

A. No, it cannot. The FCC has specifically defined shared transport as including the use of the ILEC's existing routing tables. These are the same routing tables that route Ameritech Illinois' retail and resale end user customers' calls that select Ameritech Illinois as its intraLATA toll provider across the Ameritech intraLATA toll facilities and

that route Ameritech Illinois' retail and resale end user customers' calls that select other intraLATA toll providers to those intraLATA toll networks. The FCC stated in the Third Reconsideration Order:

> As noted above, although interoffice transport, as we define the element pursuant to section 251(c)(3), refers to the transport links in the incumbent LEC's network, access to those links on a shared basis effectively requires a requesting carrier to utilize the routing table contained in the incumbent LEC's switch. (Emphasis added).[4]

The only method that could be used to route an IXC's intraLATA toll traffic entirely on Ameritech Illinois' network would be to use custom routing for that traffic. This is not envisioned by the FCC in its description of shared transport and would not use the ILEC's routing tables.

The Ameritech Illinois routing tables that define shared transport route local, intraLATA toll, and interLATA toll calls in the exact same manner for Ameritech Illinois' retail customers, CLEC end users served via Resale, and CLEC end users served via any UNE combination that utilizes shared transport. Specifically, intraLATA and interLATA toll calls are routed to the end user's presubscribed toll carrier's FG-D trunks for delivery to the customer's chosen carrier. Requiring Ameritech Illinois to route intraLATA toll calls delivered via shared transport through another means than Ameritech Illinois' routing tables is inconsistent with the very definition of shared transport.

[4] Third Recon Order, 12 FCC Rcd 12460, ¶ 36.

Q. Does Ameritech Illinois believe that the use of a new type of shared transport, one with custom routing of Interexchange IntraLATA toll traffic, would fail the FCC's "necessary and impair" standards for unbundling?

A. Yes. The FCC has made it clear that the "necessary and impair" analysis must be conducted based on the type of service CLECs will provide over the UNE. Supplemental Order Clarification, CC Docket 96-98, ¶ 15 (rel. June 2, 2000). When analyzing shared transport in the UNE Remand Order and prior orders, the FCC has always looked at it in terms of being used for local exchange service. The Act promotes competition for local service and local exchange access. IntraLATA toll is an interexchange service that is already open to full competition. Indeed, since Ameritech Illinois cannot provide interLATA service, it is Ameritech, rather than the CLECs, that is hampered in the competition for a customer's intraLATA toll service. There is already in place an extensive interexchange network that carries significant amounts of intraLATA toll calls from end users that choose various intraLATA toll providers as their long distance carrier. CLECs, who are also intraLATA toll providers, do not need access to Ameritech Illinois' toll network because they already have their own toll networks in place. Furthermore, if an intraLATA toll provider does not wish to carry some of its customer's intraLATA toll calls on its network or does not already have a network, there are other long distance carriers that would willingly sell wholesale toll capacity to them. Within Ameritech Illinois' end offices, all intraLATA toll calls that are originated by end users that are not a CLEC's local service customer, but have selected that CLEC as their intraLATA toll provider, are automatically routed to that CLEC's POP by the existing routing tables. The custom routing of intraLATA toll that would be required would only

apply in situations where the CLEC's local service customer has also chosen that CLEC as their intraLATA toll provider. The majority of intraLATA toll calls served by an intraLATA toll provider will continue to route from Ameritech Illinois' switch to the intraLATA toll providers POP. Routing in this manner would only affect a small percentage of a providers intraLATA toll calls, those from the CLEC's local service customers where they are also the intraLATA toll provider. Lack of access to Ameritech Illinois' toll network clearly does not affect a CLEC's ability to compete in the intraLATA toll market in terms of the cost, timeliness, quality, ubiquity, or network operations, compared to routing the calls to the CLEC's POP. Lack of access to Ameritech Illinois' toll network clearly does not impair a CLEC; therefore, under the FCC's rules, Ameritech Illinois is not required to allow a CLEC to use customized routing to complete intraLATA toll calls over Ameritech's toll network.

IntraLATA toll services are already competitive. A Commission order allowing a CLEC access to Ameritech Illinois' toll network at UNE-based prices would introduce unnecessary regulatory intervention into the pricing of wholesale services in that market segment. Such a requirement would fail to promote reduced regulation, as contemplated by the Act.

Q. Can you provide examples of how the rate elements apply when ULS-ST is used to reach the end user's intraLATA or interLATA toll carrier?

A. Yes, I can. Schedule JLH-2 again provides call flow diagrams for various call scenarios using ULS-ST. The diagrams specific to these situations are call scenarios 15 through 25.

Q. Can Custom Routing be used with ULS-ST to route local Operator Services/Directory Assistance ("OS/DA") traffic to the CLEC's OS/DA provider of choice?

A. Yes, it can. The CLEC can choose to route OS/DA traffic to one provider for both the local OS and DA or separate providers, one for OS, another for DA.

Q. Can Custom Routing be used with ULS-ST to route toll OS/DA traffic to the IXC's provider of choice?

A. No, it cannot. Toll OS/DA traffic is routed according to the PIC (interLATA) or LPIC (intraLATA) IXC indicated on the ULS port. (The same as with any Ameritech end-user or CLEC Resale customer.) This provider then provides the routing (and transport) to the appropriate OS/DA provider they have chosen to provide service to their customers.

V. ORDERING AND BILLING PROCESSES

Q. Did the ordering process change with the introduction of ULS-ST?

A. There is no change in the ordering process for ULS-ST. It is the same as it was for ULS-IST. ULS-IST was the same as ULS, except the CLEC will not populate the Line Class Code ("LCC") field on the order. The fact that there is not an LCC value indicates the CLEC wants ULS with shared transport. ULS-ST is ordered via the Local Service Request (LSR). Specific requirements can be found on the CLEC Handbook website in both the Unbundled Elements Ordering Guide and the Electronic Service Ordering Guide. Additional exhibits and USOC information has been added for ULS-ST.

Q. Did the billing process change with the introduction of ULS-ST?

A. The only changes in the billing process for ULS-ST are relative to the removal and introduction of new rate elements. The bill structures and displays remain the same. The bill continues to be produced from the RBS Billing system. As per the Operations Support Systems ("OSS") Plan Of Record ("POR") at the FCC, ULS-ST billing will move to CABS in the fourth quarter of 2001[5].

The Daily Usage Feed is also updated to contain the terminating ULS usage records as well as the access usage records (both originating and terminating). These records will continue to be produced using the Electronic Message Interface ("EMI") format based on guidelines established by the Alliance for Telecommunications Industry Solutions ("ATIS") Ordering & Billing Forum ("OBF"). Details of these usage records can also be found on the website.

Q. Does this conclude your direct testimony?

A. Yes, it does.

[5] Uniform and Enhanced OSS Plan Of Record, p. 58.

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PART 19 - Unbundled Network Elements and Number Portability
SECTION 21 - Unbundled Local Switching with Shared Transport

1st Revised Sheet No. 1
Cancels
Original Sheet No. 1

1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST)

A. DESCRIPTION

General

Unbundled Network Elements are available to Telecommunications carriers for use in the provision of a telecommunications service as specified, to the extent required by, and pursuant to the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) ("the Act") and the rules, regulations, and orders of the Federal Communications Commission (FCC) and the Illinois Commerce Commission.

Ameritech Illinois, hereinafter referred to as the "Company", provides only to telecommunications carriers subscribing to Unbundled Local Switching (ULS), as described in this section, the function of shared transport (as defined in the FCC's Third Order on Reconsideration and Further Notice of Proposed Rulemaking, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, 12 FCC Rcd 12460 (1997)(Third Recon Order) under terms and conditions, other than rate structure & price, that are substantially similar to (or more favorable than) the most favorable terms SBC/Ameritech offers to telecommunications carriers in Texas as of August 27, 1999. ULS-ST will be available by October 8, 2000, as described in Paragraph 56 of the Attachment 1 in the August 27, 1999 ex *parte* to the FCC *in In the Matter of the SBC/Ameritech Merger*, CC Docket No. 98-141. The terms and conditions of the FCC SBC/Ameritech Merger Conditions (Memorandum Opinion and Order, Appendix C in FCC Docket No. 98-141 (FCC 99-279, rel. October 8, 1999) ("FCC Conditions") are incorporated herein by reference (hereinafter referred to as ("*ULS-ST*"). Telecommunications carriers that already have an interconnection agreement with the Company pursuant to Section 252 of the Telecommunications Act of 1996 shall be permitted to purchase ULS-ST under this tariff. ULS-ST is only available to a requesting telecommunications carrier for the provision of local exchange service. ULS-ST is not available when Unbundled Local Switching is not required by law to be provided, including due to the applicability of 47 C.F.R. section 51.319(c)(1)(A). (C) (C)

Pursuant to SBC/Ameritech Merger Condition 28 B in Ill. C.C. Docket No. 98-0555 dated September 23, 1999, and Order in Ill. C.C. Docket No. 00-0636, issued October 6, 2000.

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PART 19 - Unbundled Network Elements and Number Portability
SECTION 21 - Unbundled Local Switching with Shared Transport

Original Sheet No. 2

1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. *DESCRIPTION (cont'd)*

General (cont'd)

General Regulations, as found in Part 2 of this Tariff and Section 1 of this Part, apply to this Section unless otherwise specified in this Section. The term "customer," which appears in Part 2 General Regulations of this Tariff, is the equivalent of the term "telecommunications carrier" as used in this Part. Any references in this Section to service descriptions as shown in this Tariff shall include service operations and availability, and definitions. Unless expressly provided to the contrary herein, however, such references do not incorporate the terms and conditions related to the application of rates or minimum service quantity provisions as well as the rates and charges themselves contained in the referenced material.

Where capacity exists in the Company's end-office switch providing the Unbundled Local Switching component of ULS-ST, the Company will provide central office features with SS7 technology.

Telecommunications carriers subscribing to ULS-ST are required to provide all information regarding their end users that is required to include such end users in the 9-1-1 database, and in a format and media prescribed by the Company.

The ULS capability of ULS-ST is the Company's telecommunications network element offering unbundled access to local switching capability through a line-side and/or trunk-side port, which provides access to all features, functions, and capabilities of the switch. Other features, functions and capabilities the switch is capable of providing but are not currently available from the Company may be requested through the Bona Fide Request Process.

ULS-ST provides the ULS capability, separate from the local loop or other services on a per line basis, and Shared Transport as described following in this Section. Notwithstanding the provisions of this Section, Collocation, as set forth in Part 23, Section 4 of this Tariff, will not be required for the provision of currently combined ULS-ST and Unbundled Local Loops provided through Section 15 of this Part, Provision of Existing Combinations of Network Elements. (N)

Pursuant to SBC/Ameritech Merger Conditions in Ill. C.C. Docket No. 98-0555 dated September 23, 1999

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ILLINOIS BELL
TELEPHONE COMPANY

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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. *DESCRIPTION (cont'd)*

ULS-ST Features

ULS-ST Line-Side Access

A line-side port (line port) accesses capabilities within the end office switch and the vertical features associated with the particular port type provided, as shown under Feature Availability following. The line port is provided pursuant to rates by port type as shown in F. Prices following.

Telecommunications carriers can electronically request activation of individual vertical features on a per line port basis to meet the requirements of their individual end-users. These line port types are:

- Basic Port
- Ground Start Port
- ISDN-Direct Port
- Centrex Basic Port
- Centrex Attendant Port
- Centrex EKL Port
- Centrex ISDN Port

ULS-ST Trunk-Side Access

The trunk-side port (trunk port) accesses capabilities within the end-office switch.

ULS provides optional access to a trunk side DS1 port connection by which a variety of trunk port types may be accessed with each trunk port type being associated with particular functionalities and features which are shown in B. following and rates in F. following. These trunk port types are:

- Direct-In-Dial (DID) Trunk Port
- ISDN Prime Trunk Port
- Digital Trunk Port

(N)

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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. DESCRIPTION (cont'd)

ULS-ST Features (cont'd)

ULS-ST Features, Functions and Capabilities

The features, functions, and capabilities of the end office switch include access to all available basic local switching functions and basic capabilities the switch is capable of providing and which the Company currently makes available to its end-user customers for the port type selected. Access to other basic capabilities that the switch is capable of providing, but are not currently resident in the switch may be requested through a Bona Fide Request. Access to other features, functions and capabilities currently resident in the switch but not offered by the Company can be requested through a Bona Fide Request.

The Company makes available access to the following features, functions, and capabilities as a part of ULS-ST, which are:

- basic local switching function of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks
- a telephone number
- dial tone
- one alphabetical (white pages) directory listing
- signaling
- access to 9-1-1
- access to Company's Operator Services
- access to Company's Directory Assistance

- all currently resident vertical features in the end office switch where ULS-ST is being provided (e.g. Custom Calling, CLASS and Centrex features; available in feature sets associated with the type of port ordered and as listed under Feature Availability following).

Variations in the end-office switching equipment used to provide service in specific locations might cause differences in the operation of certain features, functions and capabilities. (N)

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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. *DESCRIPTION (cont'd)*

ULS-ST Features (cont'd)

ULS-ST Capabilities

The Shared Transport capability of ULS-ST represents the Company's interoffice trunk network, including end office and tandem trunk ports, tandem switching, interoffice facilities between Company's switches, and central office routing tables. Shared Transport is provided for the delivery of telecommunications carrier switched voice traffic for local calls on Company's interoffice trunk network. Telecommunications carriers subscribing to Shared Transport may also use it as an unbundled network element to carry originating access traffic from, and terminating access traffic to, end users to whom the requesting carrier is also providing local exchange service (CC Third Recon Order, para. 2).

Shared Transport refers to transmission facilities connecting Company's switches and that can be shared by more than one LEC, including the Company. Those transmission facilities include those between Company's end office switches, between Company's end office switch and Company's tandem switch, and between Company's tandem switches, as described in CC Third Recon Order, para. 54.

The Company will use the existing Company routing tables contained in Company switches to provision ULS-ST. (N)

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Cancels
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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd)

A. DESCRIPTION (cont'd)

ULS-ST Features (cont'd)

ULS-ST Shared Transport - Transit

Shared Transport-Transit is a capability of ULS-ST as described below.

(D)
(D)

The Company will not require telecommunications carriers that subscribe to ULS-ST to use dedicated transport or customized routing to originate and complete traffic through Company's network to non-Company switches. The Company provides a modified version of transiting that does not require a dedicated end office integration ("EOI") transit trunk. This transit function (called "Shared Transport-Transit") permits telecommunications carriers subscribing to ULS-ST to use shared facilities and not dedicated transport, as described in the Third Recon Order, paras. 28 and 29, between Company's central offices switches and non-Company central offices switches providing local, wireless, or interexchange services. All Interexchange services will be routed to the PIC or 2-PIC carrier. *See Diagram 1 following.*

Pursuant to SBC/Ameritech Merger Condition 28 B in Ill. C.C. Docket No. 98-0555 dated September 23, 1999, and Order in Ill. C.C. Docket No. 00-0636, issued October 6, 2000.

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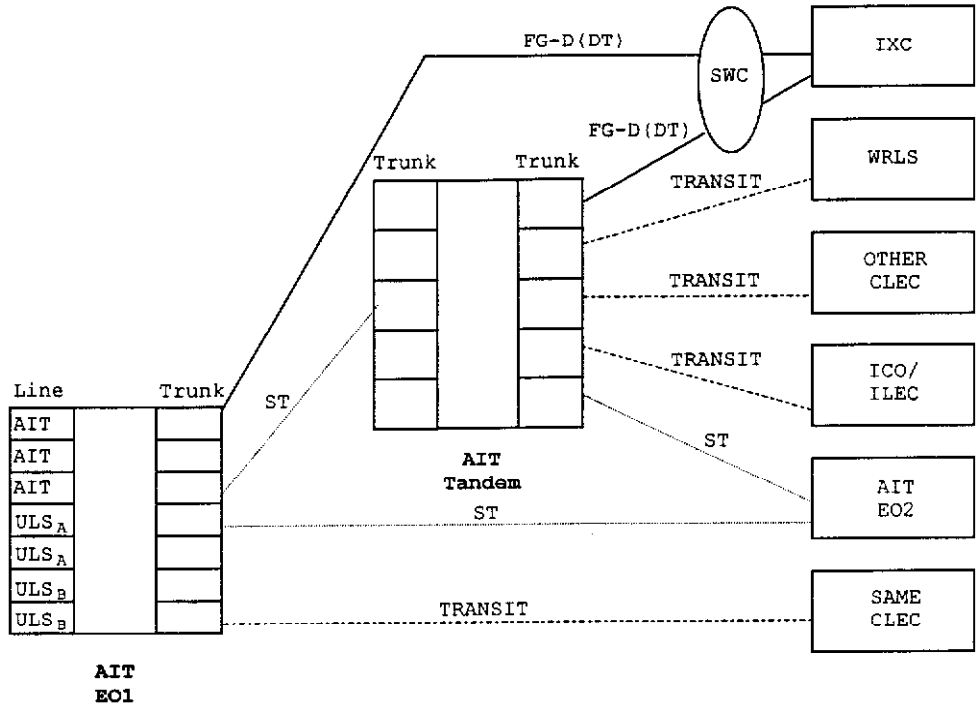
1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. DESCRIPTION (cont'd)

DIAGRAM 1

Shared Transport Network Diagram



(N)

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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. DESCRIPTION (cont'd)

ULS-ST Features (cont'd)

ULS-ST Daily Usage Feed

The Company will provide a Daily Usage Feed (DUF) to each Carrier that subscribes to ULS-ST that contains, on a per-call basis, originating and terminating usage detail for each line-side ULS port used to provide ULS-ST. The DUF will include the available local (originating and terminating) and access (originating and terminating) usage records.

The Company shall not have any responsibility for providing any billing information to the end-user customers of a telecommunications carrier that purchases ULS-ST. The telecommunications carrier that purchases ULS-ST will be solely responsible for establishing compensation arrangements with all telecommunications carrier(s) to which traffic is delivered, or from which traffic is received, using ULS-ST, including all traffic carried by Shared Transport-Transit. The Company may provide information regarding such traffic to other telecommunications carriers as appropriate to resolve inter-carrier compensation issues.

Billing for 900 and 976 call or other pay-per-call services will be passed through to the Carrier when the Company records the message. If a Carrier does not wish to be responsible for 900 and 976 calls, it must assign appropriate Line Class Code (LCC) blocking to the ULS ports under this Part. When the Interexchange Carrier records the 900 and 976 calls, the call detail will be returned to the Interexchange Carrier.

Custom OS/DA Call Routing Capability

With a custom call routing capability for OS and/or DA ("OS/DA"), calls to a third party provider are available with ULS-ST as described in Part 19, Section 3 of this Tariff. Other requests for custom OS/DA provisioning can be requested via the Bona Fide Request process. (N)

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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. *DESCRIPTION (cont'd)*

ULS-ST Features (cont'd)

Feature Availability
Line-Side Basic Port and Ground Start Port Features[1/]

The following line-side features are available, dependent upon the capabilities of the specific switch, for activation on the line-side basic port and the ground start port:

Call Waiting
Call Forwarding - Variable
Three-way Calling
Speed Calling
Automatic Callback
Repeat Dialing
Call Screening
Caller ID
Busy Line Transfer
Busy Line Transfer / Customer Control Option
Alternate Answering
Alternate Answering / Customer Control Option
Message Waiting Tone
Easy Call
Special Delivery Feature
Multi-Ring Service
Remote Call Forwarding
Direct Connect (N)

/1/ For feature descriptions, see Ill. C.C. No. 20, Part 22, Section 7.

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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. *DESCRIPTION (cont'd)*

ULS-ST Features (cont'd)

Feature Availability (cont'd)
ISDN-Direct Port Features[1/]

The features available for activation on the ISDN-Direct port include the following:

Circuit Switched Voice Service

Analog Line Appearance
Call Hold
Call Transfer
Called Number Display
Caller ID
Conference Calling - 3 Way
Denied Origination
Denied Termination
Hunting
Shared Call Appearance
Multiple Call Appearance
Additional Call Offering
Additional Multiple Call Appearance
Alternate Answer
Automatic Callback
Busy Line Transfer
Call Forwarding-Variable
Call Screening
Distinctive Ringing
Intercom Calling
Message Waiting Indicator
Repeat Dialing
Secondary Telephone Numbers
Station-Controlled Conference (6 Port)
Speed Calling-8
Speed Calling-30 (N)

/1/ For feature descriptions, see Ill. C.C. No. 20, Part 22, Section 17.

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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. DESCRIPTION (cont'd)

ULS-ST Features (cont'd)

Feature Availability (cont'd)
ISDN-Direct Port Features /1/ (cont'd)

Circuit Switched Data/1/

Caller ID
Clear Channel Capability
Denied Origination
Denied Termination
Hunt Group for Shared Data Access
Additional Call Offering
Alternate Answer
Busy Line Transfer
Call Forwarding-Variable

Alternate Circuit Switched Voice Service/Circuit Switched Data

The standard capabilities and features are provided as shown in Circuit Switched Voice Services and Circuit Switched Data preceding. (N)

/1/ For feature descriptions, see Ill. C.C. No. 20, Part 22, Section 17.

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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. *DESCRIPTION (cont'd)*

ULS-ST Features (cont'd)

Feature Availability (cont'd)
Basic Centrex Port, Centrex ISDN Port, and Electronic Key Port Features[1/]

The following features are available for activation on the basic Centrex port.

N/A - Not Applicable All Others - Standard

Voice	Basic	Electronic Key	ISDN
Add On Modules	N/A		
Analog Line Pickups	N/A		N/A
Automatic Callback			
Automatic Dial	N/A		
Automatic Line Preselect	N/A		
Blind Transfer with Recall Identification	N/A		N/A
Call Camp-On			
Call Camp-On Selective			
Call Diverting			
Call Forward of Call Waiting Calls			N/A
Call Forwarding - Busy			
Call Forwarding - Don't Answer			
Call Forwarding - Variable			
Call Forwarding per key	N/A		
Call Forwarding Over Private Facilities			
Call Hold			
Call Park			
Call Pickup			
Call Request	N/A		
Call Request with Queue			
Call Transfer - All			
Call Transfer (Inter-system) - Deluxe			
Call Waiting/Cancel Call Waiting			N/A
Called Number Display	N/A		

(N)

/1/ For feature descriptions, see Ill. C.C. No. 20, Part 22, Section 5.

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1. UNBUNDLED LOCAL SWITCHING WITH SHARED TRANSPORT (ULS-ST) (cont'd) (N)

A. *DESCRIPTION (cont'd)*

ULS-ST Features (cont'd)

Feature Availability (cont'd)
Basic Centrex Port, Centrex ISDN Port, and Electronic Key Port Features[1/] (cont'd)

N/A - Not Applicable All Others - Standard

Voice (cont'd)	Basic	Electronic Key	ISDN
Caller ID			
Caller ID Intercom			
Calling Name Display on Intercom	N/A		
Calling Reason Display	N/A		
CLASS Automatic Callback			
CLASS Call Screening			
CLASS Distinctive Ringing			
CLASS Repeat Dialing			
CLASS Visual Message Waiting Indicator		N/A	N/A
Conference Calling, 3 Way			
Consultation Hold			
Direct Connect Originating			
Direct Connect Originating with Delay			
Direct Inward Dialing (DID)			
Direct Outward Dialing (DOD)			
Direct Station Selection/Busy Lamp Field with Fast Transfer	N/A		
Directed Call Park			
Directed Call Pickup			
Directory Number Hunt with Call Waiting and Preferential Hunt	N/A		
Display Capability	N/A		
Distinctive Ringing and Call Waiting Tone			
End to End Signaling			
Equal Access for interLATA Calling			
Executive Busy Override	N/A		
Executive Busy Override - Exempt	N/A		
Executive Display Communications	N/A		N/A (N)

/1/ For feature descriptions, see Ill. C.C. No. 20, Part 22, Section 5.

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